

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Lori Saroya,

Court File No. 24-CV-110 (DWF/DTS)

Plaintiff,

v.

CAIR Foundation, Inc. d/b/a
Council on American-Islamic Relations &
CAIR,

**DECLARATION OF
NEHAD HAMMAD**

Defendant.

Pursuant to 28 U.S.C. § 1746, Nehad Hammad declares, as follows:

1. My name is Nehad Hammad (Nihad Awad). I have personal knowledge of the facts stated in this declaration.
2. I am employed by CAIR Foundation, Inc. (“CAIR”), as National Executive Director. I have held this role since CAIR was founded approximately 30 years ago.
3. I reside in Virginia, and have lived in Virginia for more than 30 years. I have not during this time resided in Minnesota.
4. I have not traveled to Minnesota since June 2018 for any purpose related to this lawsuit or the claims Plaintiff Lori Saroya has alleged against CAIR. I traveled to Minnesota one time in January 2024 for a political engagement which had nothing to do with Ms. Saroya or her lawsuit against CAIR.
5. I do not own any property in Minnesota.

6. In my role at CAIR, my work is not, and has never been, focused specifically on Minnesota.

7. The entirety of my involvement with respect to CAIR's 2022 statement, which Plaintiff Lori Saroya has referred to as a "press release" and which is attached as Exhibit 4 to her proposed Amended Complaint (the "Community Update"), was in my professional role at CAIR.

8. Specifically, to the extent I was at all involved in drafting, revising, approving, sharing, or otherwise disseminating the Community Update, I did so solely on behalf of CAIR. I did not do so on my own behalf and did not do so in my personal or individual capacity.

9. I had no intent that the Community Update be shared with any person or entity in Minnesota. It was posted on CAIR's website, was generally available to people who chose to view CAIR's website, and was not specifically targeted to Minnesota or Minnesota residents.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: December 19, 2024

By: /s/ Nehad Hammad

Nehad Hammad